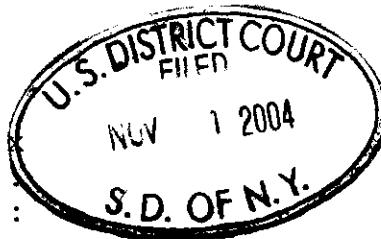


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

INDICTMENT

-v.-

S1 04 Cr. 971 (WHP)

PAUL CREARY,
WENDY BROWN,
a/k/a "Wendy Brewster,"
JOY BROWN,
a/k/a "Joan Brown,"
TARELLE JONES,
CURLENE REID,
a/k/a "Curlene Manswell,"
GARY DAVIS,
a/k/a "Gary Andre Davis,"
a/k/a "Peter P. Grant,"
a/k/a "Gary Andrew Davis,"
a/k/a "Frank A. Jones Jr.,"
a/k/a "Peter Andre Davis,"
a/k/a "Peter Grant,"
a/k/a "Frank A. Jones,"
a/k/a "Richard Smith,"
TIMOTHY JONES,
KEISHA ANDERSON, and
TANESHA MOORE,
a/k/a "Sophia Alicia Dyer,"

Defendants.

x

COUNT ONE

The Grand Jury charges:

1. From in or about September 2003, up to and including in or about August 2004, in the Southern District of New York and elsewhere, PAUL CREARY, WENDY BROWN, a/k/a "Wendy Brewster," JOY BROWN, a/k/a "Joan Brown," TARELLE JONES, CURLENE REID, a/k/a "Curlene Manswell," GARY DAVIS, a/k/a "Gary Andre Davis," a/k/a "Peter P. Grant," a/k/a "Gary Andrew Davis," a/k/a "Frank A. Jones

Jr.," a/k/a "Peter Andre Davis," a/k/a "Peter Grant," a/k/a "Frank A. Jones," a/k/a "Richard Smith," TIMOTHY JONES, KEISHA ANDERSON, and TANESHA MOORE, a/k/a "Sophia Alicia Dyer," the defendants, together with others known and unknown, unlawfully, willfully, and knowingly, did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Sections 1028(a)(1) and (a)(2).

2. It was a part and an object of the conspiracy that PAUL CREARY, WENDY BROWN, a/k/a "Wendy Brewster," JOY BROWN, a/k/a "Joan Brown," TARELLE JONES, CURLENE REID, a/k/a "Curlene Manswell," GARY DAVIS, a/k/a "Gary Andre Davis," a/k/a "Peter P. Grant," a/k/a "Gary Andrew Davis," a/k/a "Frank A. Jones Jr.," a/k/a "Peter Andre Davis," a/k/a "Peter Grant," a/k/a "Frank A. Jones," a/k/a "Richard Smith," TIMOTHY JONES, KEISHA ANDERSON, and TANESHA MOORE, a/k/a "Sophia Alicia Dyer," the defendants, together with others known and unknown, unlawfully, willfully, and knowingly, and without lawful authority, would and did produce an identification document, authentication feature, and false identification document, some of which appear to be issued by or under the authority of the United States, in a circumstance in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1028(a)(1).

3. It was further a part and an object of the conspiracy that PAUL CREARY, WENDY BROWN, a/k/a "Wendy Brewster," JOY BROWN,

a/k/a "Joan Brown," TARELLE JONES, CURLENE REID, a/k/a "Curlene Manswell," GARY DAVIS, a/k/a "Gary Andre Davis," a/k/a "Peter P. Grant," a/k/a "Gary Andrew Davis," a/k/a "Frank A. Jones Jr.," a/k/a "Peter Andre Davis," a/k/a "Peter Grant," a/k/a "Frank A. Jones," a/k/a "Richard Smith," TIMOTHY JONES, KEISHA ANDERSON, and TANESHA MOORE, a/k/a "Sophia Alicia Dyer," the defendants, and others known and unknown, unlawfully, willfully, and knowingly, would and did, transfer an identification document, authentication feature, and false identification document, knowing that such document and feature was stolen and produced without lawful authority, some of which appear to be issued by or under the authority of the United States, in a circumstance in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1028(a)(2).

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts were committed in the Southern District of New York and elsewhere:

a. In or about October 2003, in Bronx, New York, CURLENE REID, a/k/a "Curlene Manswell," the defendant, arranged a meeting for a cooperating witness ("CW-1") to obtain fraudulent documents.

b. On or about November 17, 2003, in Bronx, New York, PAUL CREARY, the defendant, discussed with a confidential informant ("CI-1") selling a fraudulent United States driver's

license, a fraudulent birth certificate, and a fraudulent Social Security card.

c. On or about December 8, 2003, in Bronx, New York, PAUL CREARY, the defendant, accepted \$1500 from CI-1 as payment for a fraudulent United States driver's licence, birth certificate, and Social Security card.

d. On or about December 12, 2003, in Bronx, New York, PAUL CREARY, the defendant, delivered a fraudulent Michigan birth certificate, a fraudulent Connecticut driver's license, and a fraudulent Social Security card to CI-1.

e. On or about April 2, 2004, WENDY BROWN, a/k/a "Wendy Brewster," the defendant, used a telephone located in Yonkers, New York, to have a telephone conversation with PAUL CREARY, the defendant, concerning fraudulent documents.

f. On or about April 9, 2004, TANESHA MOORE, a/k/a "Sophia Alicia Dyer," the defendant, used a telephone located in Bronx, New York, to have a telephone conversation with PAUL CREARY, the defendant, concerning fraudulent documents.

g. On or about April 22, 2004, TARELLE JONES, the defendant, used a telephone located in Bronx, New York, to have a telephone conversation with PAUL CREARY, the defendant, concerning payment for fraudulent documents.

h. On or about April 23, 2004, GARY DAVIS, a/k/a "Gary Andre Davis," a/k/a "Peter P. Grant," a/k/a "Gary Andrew Davis," a/k/a "Frank A. Jones Jr.," a/k/a "Peter Andre Davis,"

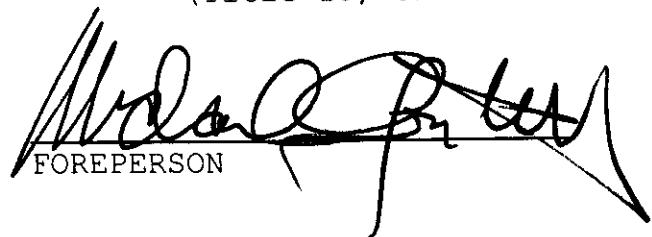
a/k/a "Peter Grant," a/k/a "Frank A. Jones," a/k/a "Richard Smith," the defendant had a telephone conversation with PAUL CREARY, the defendant, concerning the production of fraudulent documents.

i. On or about May 6, 2004, JOY BROWN, a/k/a "Joan Brown," the defendant, used a telephone located in Jamaica, New York, to have a telephone conversation with PAUL CREARY, the defendant, concerning fraudulent documents.

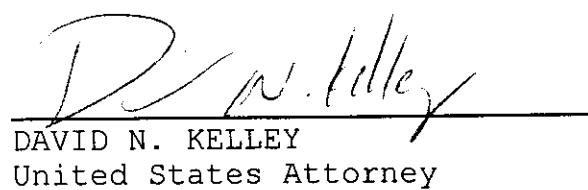
j. On or about May 18, 2004, KEISHA ANDERSON, the defendant, had a telephone conversation with PAUL CREARY, the defendant, concerning fraudulent documents.

k. On or about June 5, 2004, TIMOTHY JONES, the defendant, left a voice message for PAUL CREARY, the defendant, regarding fraudulent documents.

(Title 18, United States Code, Section 1028(f).)



Joyce Brown
FOREPERSON



DAVID N. KELLEY
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INDICTMENT

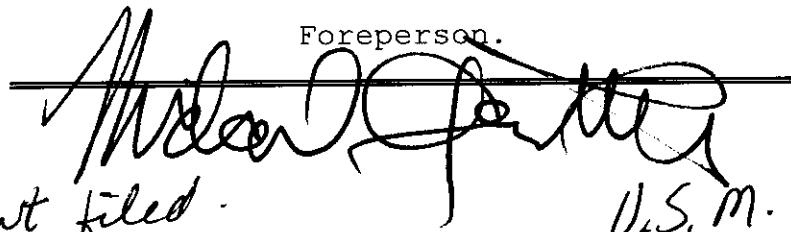
S1 04 Cr. 971 (WHP)

(18 U.S.C. § 1028(f).)

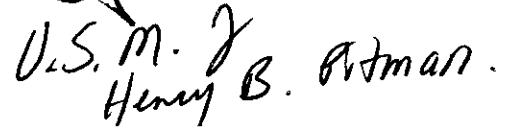
DAVID N. KELLEY
United States Attorney.

A TRUE BILL

Foreperson.



11/1/04, indictment filed


U.S. M. J.
Henry B. Atman.